



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 20 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 6483
RETURN RECEIPT REQUESTED

Mr. George Phillips
SIPI Metals Corporation
1720 North Elston Avenue
Chicago, Illinois 60642-5066

Re: Request for Information
SIPI Metals Corporation
EPA I.D.: ILD 005 121 439

Dear Mr. Phillips:

This letter seeks your cooperation in providing information and documents relating to the U.S. Environmental Protection Agency's compliance inspection on July 9, 2013 at the SIPI Metals Corporation's ("SIPI" or "you") facility at 1720 North Elston Avenue, Chicago, Illinois. We have enclosed a copy of our inspection report for your reference. Specifically, EPA requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927, related to the generation, storage, handling and transportation of hazardous waste at your facility. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

We are requiring this information to determine SIPI's compliance with the regulations for generators of hazardous waste set forth at 40 C.F.R. Part 262 (35 Illinois Administrative Code Part 722). The enclosure specifies the information SIPI must submit. You must submit this information within thirty (30) calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Jamie Paulin, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. §2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. SIPI must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

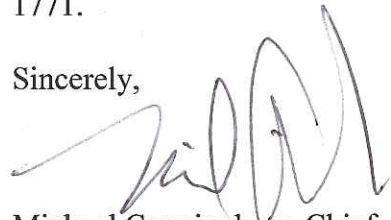
SIPI must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject SIPI to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Jamie Paulin, at (312) 886-1771.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Cunningham', is written over the word 'Sincerely,'.

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

Enclosures

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

REQUEST FOR INFORMATION

Instructions: SIPI must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

All terms used in this request for information shall have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. §§ 6901 et seq. and its implementing regulations.

Unless otherwise indicated, the Requests below cover the time period from July 9, 2013, to the present.

Requests:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, name of the individual's employer, and business telephone number for each individual identified.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all documents.
3. If SIPI has reason to believe that there may be persons able to provide a more detailed or complete response to any Request or who may be able to provide additional responsive documents, identify such persons.
4. Provide the full name of the current owner or owners of SIPI.
5. During the inspection, SIPI stated that the zinc oxide dust is generated from the air pollution control baghouses. With respect to SIPI's management of the zinc oxide dust, please provide the following information:
 - a) For the last five years from the date of your receipt of this Request for Information, describe in detail how SIPI has managed the zinc oxide dust including, but not limited to: how the material is stored at SIPI; and, how the material is disposed of, re-used or otherwise handled by SIPI.
 - b) During the inspection, SIPI stated that it is currently shipping the zinc oxide dust off-site to Old Bridge Chemicals, Inc., or American MicroTrace. Provide the full names and addresses of all the facilities that have received the material for the last five years from the date of your receipt of this Request for Information.
 - c) For the three year period immediately preceding your receipt of this Request for Information, provide true and accurate copies of all records (e.g., bills of lading, manifests, etc.) that document off-site shipments, and include: the name of the transporter and the date of each shipment; name and address of the receiving facility and

documentation confirming receipt of each shipment; and type and quantity of material in each shipment.

d) State if SIPI has evaluated whether this material possesses any of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity, and toxicity), pursuant to 35 IAC § 722.111 [40 C.F.R. § 262.11]. Provide true and accurate copies of all analyses that have been conducted on the zinc oxide dust, including TCLP or total metals.

e) If the answer to 2(d), above, is affirmative, provide true and accurate copies of all of the records that document these hazardous waste determinations. Provide the date, methodology and results of each hazardous waste determination, if this information is not clearly described on each record.

f) If the answer to 2(d), above, is affirmative, and the hazardous waste determinations were not committed to writing, please provide a detailed description of the methods used to make the hazardous waste determinations, the results of the hazardous waste determinations, and the approximate dates the determinations occurred. Also, please identify the person(s) who provided this description.

g) If this material is shipped off-site, provide a description of how the material has been used, treated, recycled, disposed of or otherwise managed by the receiving facilities. If SIPI does not have knowledge of how the material has been used, treated, recycled, disposed of or otherwise managed by the receiving facilities, please state so clearly. Provide true and accurate copies of all contracts with the receiving facilities for the zinc oxide dust.

6. Have you ever claimed the conditional exclusion for your zinc oxide dust by submitting a one-time notice EPA or State Director (Illinois Environmental Protection Agency) as described in 40 C.F.R. § 261.4(a)(20)(ii)(A). If so, please provide a true and accurate copy of the one-time notice.

Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of information and documents. Based on my review of all relevant information and documents, and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date

Signature and Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 W. JACKSON BOULEVARD

CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: SIPI Metals Corp

EPA ID No.: ILD 005 121 439

LOCATION ADDRESS: 1720 North Elston Avenue
Chicago, Illinois 60642-5066

NAICS CODE(S): 331492 [Secondary Smelting, Refining, and Alloying of
Nonferrous Metal (Except Copper and Aluminum)]

DATE OF INSPECTION: July 9, 2013

EPA INSPECTOR: Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY: Jamie L. Paulin 8/15/13
Jamie L. Paulin Date
Chemist

REVIEWED BY: for Cindy Dabner 8/16/13
Cindy Dabner, Acting Chief Date
Compliance Section 1
RCRA Branch

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the SIPI Metals Corporation (SIPI Metals) facility, located at 1720 North Elston Avenue, Chicago, Illinois, to examine SIPI Metals' management of its Resource Conservation and Recovery Act (RCRA) regulated waste, by the U.S. Environmental Protection Agency.

SIPI Metals notified as a large quantity generator (LQG) on or about November 19, 1980, and has remained in LQG status. SIPI Metals is a precious metals refinery and recovers precious metals from hazardous waste and from scrap, meeting the precious metals exemption. SIPI Metals does generate hazardous waste from its Cyanide Solution Processing Operation and from its Acid Solution Processing Operation. Various D and F waste codes may apply to these wastes, depending on what is processed.

Furnace bricks that can no longer be used within the refinery are then categorized as hazardous waste and shipped off-site for disposal. SIPI Metals also generates zinc oxide dust that is collected from the air pollution control baghouses. Two separate pollution control dust streams are generated from the air pollution control system. One is generated from the Brass Ingot Operation, which is shipped monthly to Old Bridge Chemicals, Inc. to be made into micronutrients or into fertilizer. The other dust is generated from the Precious Metals Operations, which is disposed of as a hazardous waste when it cannot be recycled or re-used.

The slag that is generated is shipped off-site via rail to a Canadian Company.

SIPI Metals employs about 150 people and operates 24 hours per day. The company started in the early 1900s and moved to the Elston location in the 1920s.

SIPI Metals additionally has an Air Permit and discharges storm water via the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC).

OPENING CONFERENCE:

I entered the SIPI Metals facility at 10:00 am on July 9, 2013. I introduced myself, presented my credentials, and described the purpose of my visit. I met with Mr. George Phillips, Senior Vice President, Regulatory Affairs. The personnel that were in attendance at the opening conference are listed in *Table 1*.

I provided a Small Business Resources Information Sheet and the Illinois Sustainable Solutions brochure to Mr. Phillips. Mr. Phillips did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

Mr. Phillips described the process and operations of SIPI Metals during the opening conference. According to Mr. Phillips, SIPI Metals receives, on hazardous waste manifests, hazardous wastes, from various facilities, and recovers precious metals from these wastes. SIPI Metals is also a precious metals refinery.

Mr. Phillips further explained that SIPI Metals has two processes used to recover the metals: 1) Cyanide Solution Processing; and, 2) Acidic Solution Processing. *See Attachment 2*, process flow charts. The end of each process generates hazardous waste, which is shipped off-site for disposal via Heritage Environmental.

Table 1. Personnel in Attendance during CEI at SIPI Metals.

Personnel	Title	Department
George Phillips	Senior Vice President Regulatory Affairs	SIPI Metals
Jamie Paulin	Chemist	EPA RCRA Branch

We began the physical site inspection immediately following the opening conference.

SITE INSPECTION:

Mr. Phillips escorted me on the physical inspection, which began inside the building in the receiving area. Mr. Phillips then showed me all of the processes and areas; such as, 1) Precious Metals Department Sampling Room; 2) Precious Metal Pre-Lab Area; 3) Security; 4) Maintenance; 5) Milling Department, where the gas and electric furnaces were located; 6) the Slag Recovery Furnace; and, 7) Discharge of Ingots Quench. *See Attachment 3*, SIPI Metals Building Plan / Site Plan.

Mr. Phillips then escorted me to the Cyanide Solution Processing Area. He explained that the wastes, received from other facilities on hazardous waste manifests, are put into the recovery process within ten (10) days. The process liquid then flows into three x 1500 gallon hazardous waste storage tanks. Mr. Phillips also stated that the floor has been certified as the secondary containment of the hazardous waste storage tanks. *See*, photographs 1 through 3.

From the Cyanide Solution Processing Area, we then entered the Acidic Solution Processing Area. Hazardous waste, collected from this area, was usually stored in 55-gallon containers. However, at the time of the inspection, no hazardous waste was being stored on-site from this area.

I inspected the Sample Laboratory after the Acidic Solution Processing Area. A satellite accumulation area (SAA) container was being stored in the Laboratory, properly labeled. *See*, photographs 4 and 5.

We then proceeded to the zinc oxide dust storage area. Mr. Phillips explained that the zinc oxide dust is collected from the air pollution control baghouses and then placed into cubic yard fiber bags. The bags are stored on the South end of the facility in a storage shed attached to the Wheelabrator Baghouse. The bags are shipped off-site monthly to Old Bridge Chemicals, Inc. or American MicroTrace. The dust may be used to make fertilizer or micronutrients. SIPI Metals is claiming the exemption for hazardous secondary materials used to make zinc fertilizers. *See*, photographs 6 and 7.

A retention pond was located on the South end of the property near the zinc oxide dust storage building. The pond was being used to collect storm water. According to Mr. Phillips, the pond is cleaned out once per year and the storm water is discharged to the MWRDGC. *See*, photographs 8 and 10.

Also in this outside area, toward the middle of the property, SIPI Metals was storing water from the quenching pits in two Baker Tanks. Mr. Phillips stated that the stored quenching water would eventually be re-used in the quenching pits. *See*, photograph 9.

Toward the West side of the property, SIPI Metals was storing sand, limestone and other materials that were being used as flux for the furnaces. *See*, photograph 11.

Lastly, storage lockers were located outside toward the middle of the property. According to Mr. Phillips, scrap that had already been received by SIPI Metals was being stored in these lockers prior to processing. *See*, photograph 12.

RECORDS REVIEW:

Mr. Phillips aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

SIPI Metals did have a RCRA training program in place.

2. Manifests

I reviewed the manifests of the hazardous waste shipments for the years 2010, 2011, 2012 and 2013. The manifest records appeared to be in order.

3. Waste Analysis and Recordkeeping

I observed that SIPI Metals did have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

4. Contingency Plan

A Contingency Plan was available for my review during the inspection.

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were available for my review during the inspection.

6. Annual Reporting

SIPI Metals had filed an annual report with IEPA by March 1 for the reporting year of 2012. They are currently listed as an LQG within the EPA's RCRAInfo database.

7. Weekly and Daily Inspections

At the time of the inspection, only SAA containers of hazardous waste were being stored on-site.

SIPI Metals does have a Chemical Operations Log that includes weekly container inspections and daily hazardous waste tank inspections.

8. Notification to Regional Administrator

SIPI Metals did not have on-site a copy of the notification to the Regional Administrator as part of the requirement to claim the exemption for hazardous secondary materials used to make zinc fertilizers

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Phillips. I explained to him that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to SIPI Metals.

I departed SIPI Metals around 2:00pm.

ATTACHMENT: (3)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Process flow charts.
Attachment 3	SIPI Metals Building Plan / Site Plan.

ENCLOSURE: (1)

Attachment 1

Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0504.JPG
Date/Time 7/9/2013
11:44:00 AM
Photographer Jamie Paulin

Description

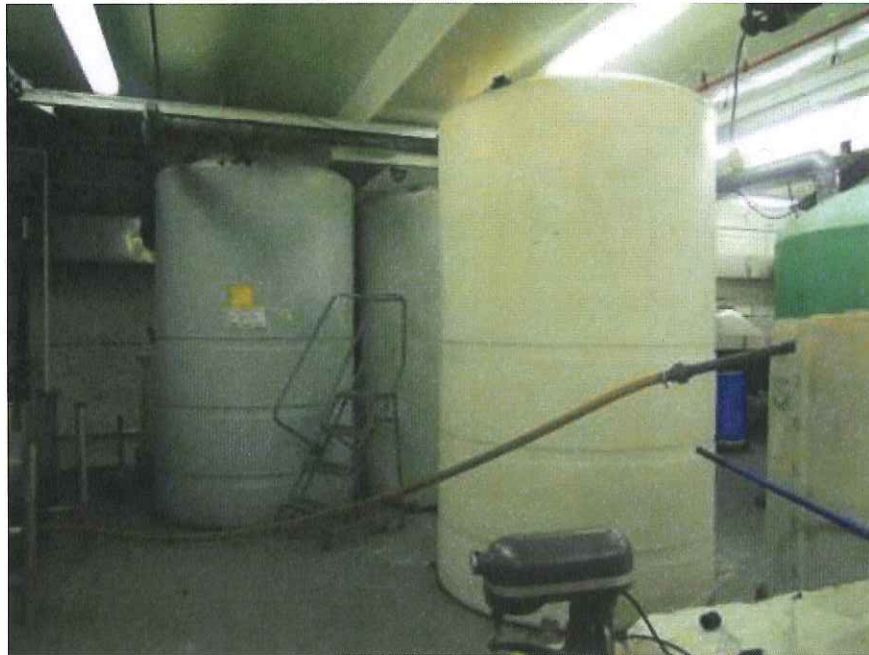
Cyanide Storage Area. Hazardous Waste Storage Tank. Accumulation start date was 7/1/13.



Disk Number 1
Photo Number 2
Photo Filename DSCN0505.JPG
Date/Time 7/9/2013
11:44:00 AM
Photographer Jamie Paulin

Description

Cyanide Storage Area and Process Area. Three hazardous waste storage tanks were located in this area.



Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0506.JPG
Date/Time 7/9/2013
11:45:00 AM
Photographer Jamie Paulin

Description

Cyanide Process and Storage Area. Cyanide process tank. An old hazardous waste label was located on the process tank. This tank appeared to be where the end of the process occurred, prior to the 90 day hazardous waste storage tanks.



Disk Number 1
Photo Number 4
Photo Filename DSCN0507.JPG
Date/Time 7/9/2013
12:01:00 PM
Photographer Jamie Paulin

Description

Sample Laboratory. Satellite Accumulation Area (SAA) white container storing acid waste was located to the right of the photograph. The red container, located on the left, was empty at the time of the inspection.



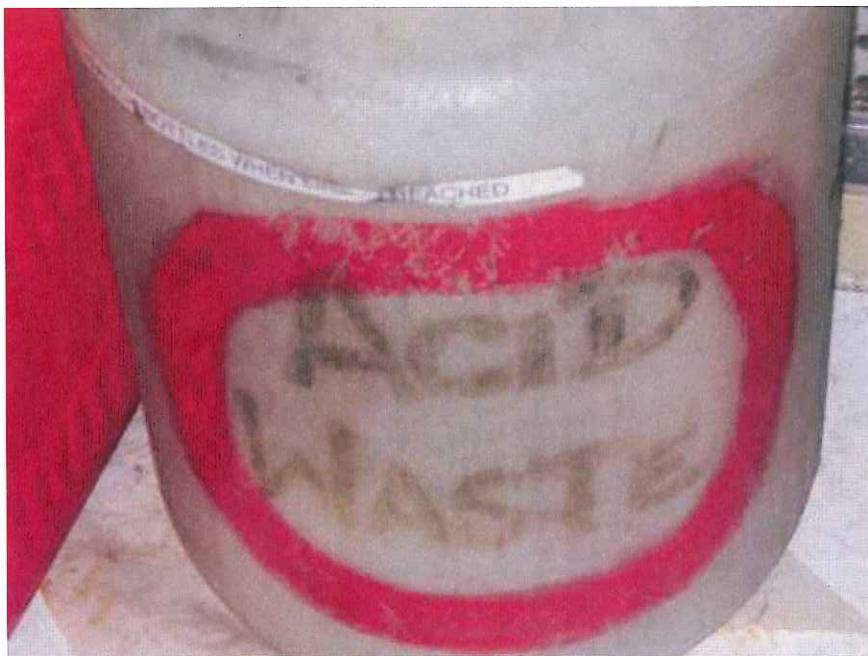
Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0508.JPG
Date/Time 7/9/2013
12:01:00 PM
Photographer Jamie Paulin

Description

Sample Laboratory. SAA container was labeled with the words, "Acid Waste."



Disk Number 1
Photo Number 6
Photo Filename DSCN0509.JPG
Date/Time 7/9/2013
12:10:00 PM
Photographer Jamie Paulin

Description

Zinc oxide dust, collected from the baghouses, was being stored in fiber bags on the South end of the facility in a storage shed attached to the Wheelabrator Baghouse.



Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0510.JPG
Date/Time 7/9/2013
12:10:00 PM
Photographer Jamie Paulin

Description

Zinc oxide dust, collected from the baghouses, was being stored in fiber bags on the South end of the facility in a storage shed attached to the Wheelabrator Baghouse.



Disk Number 1
Photo Number 8
Photo Filename DSCN0511.JPG
Date/Time 7/9/2013
12:11:00 PM
Photographer Jamie Paulin

Description

Retention pond, located on the South end of the property, was being used to collect storm water.



Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0512.JPG
Date/Time 7/9/2013
12:14:00 PM
Photographer Jamie Paulin

Description

Water from the quenching pits was being stored in two Baker tanks, located outside, on the South end of the property. The water would then be re-used into quenching pits.



Disk Number 1
Photo Number 10
Photo Filename DSCN0513.JPG
Date/Time 7/9/2013
12:15:00 PM
Photographer Jamie Paulin

Description

Retention pond filtration room.



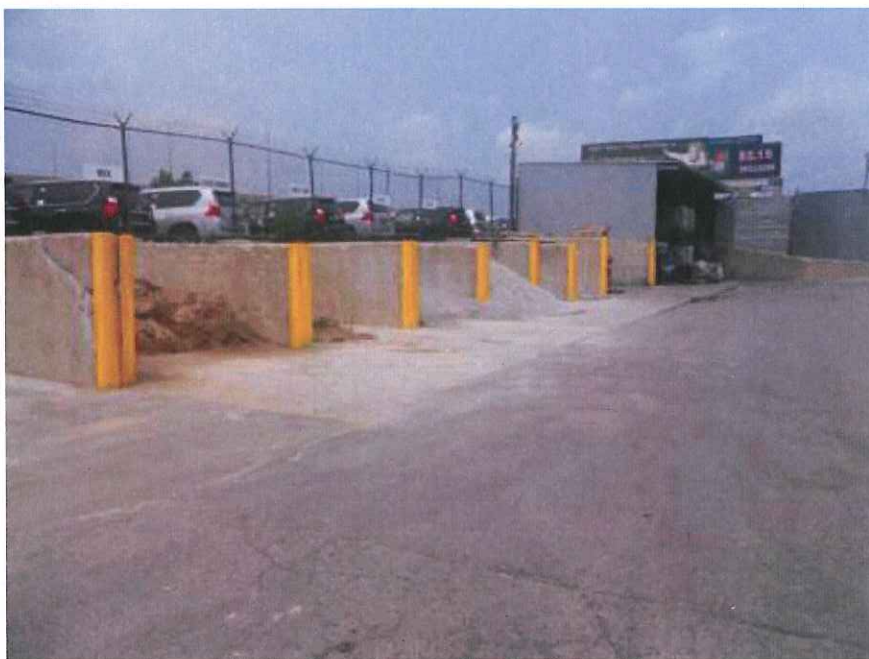
Photographs for SIPI Metals Corp CEI 7/9/13

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0514.JPG
Date/Time 7/9/2013
12:18:00 PM
Photographer Jamie Paulin

Description

Storage of sand, limestone and other materials, located outside on the West side of the property. The materials were being used as flux for the furnaces.



Disk Number 1
Photo Number 12
Photo Filename DSCN0515.JPG
Date/Time 7/9/2013
12:22:00 PM
Photographer Jamie Paulin

Description

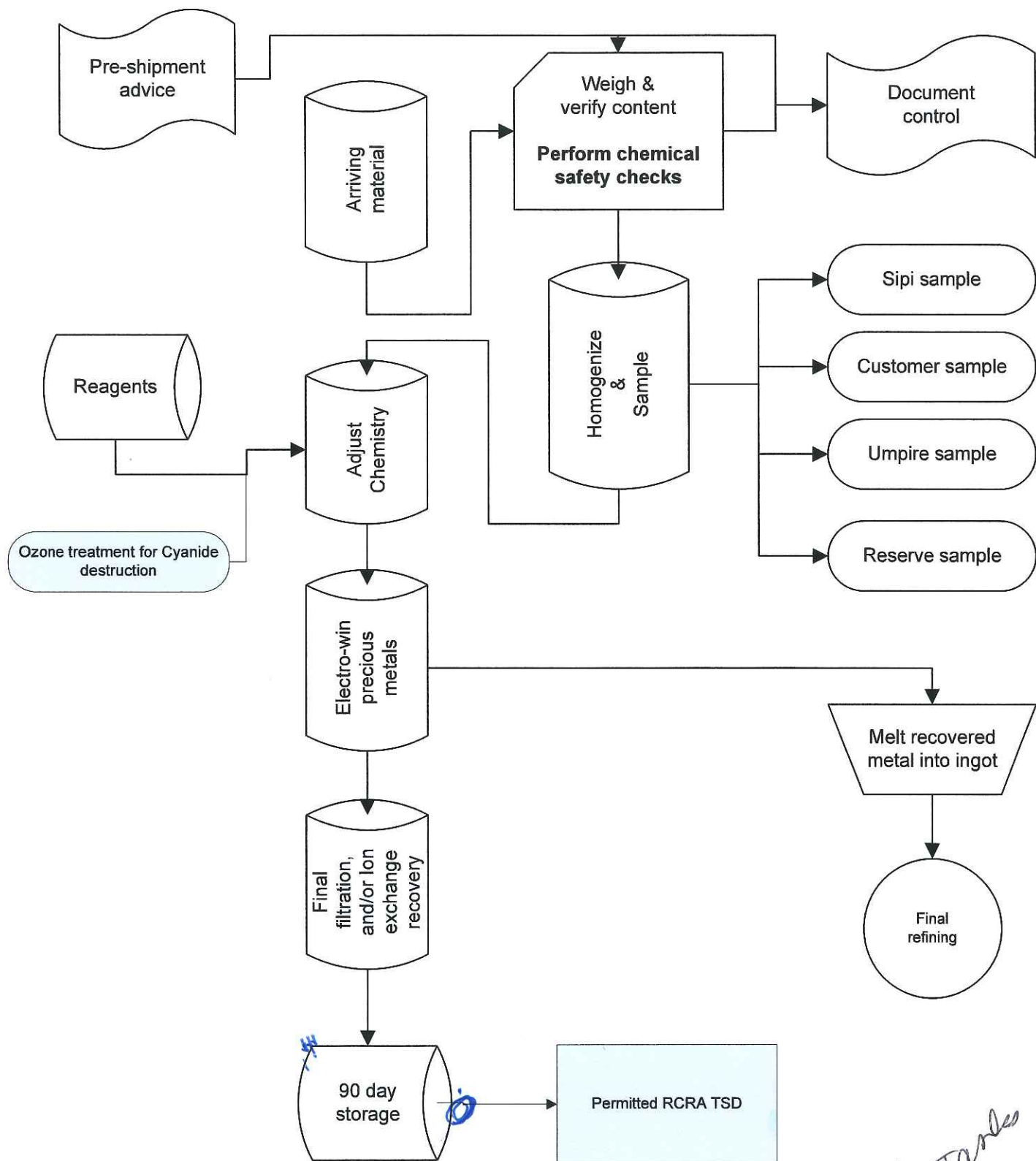
Storage lockers were located outside toward the middle of the property. Scrap that had been received at the facility was being stored in the lockers prior to processing.



Attachment 2



Cyanide Solution Processing - Flow Chart, Sipi Metals

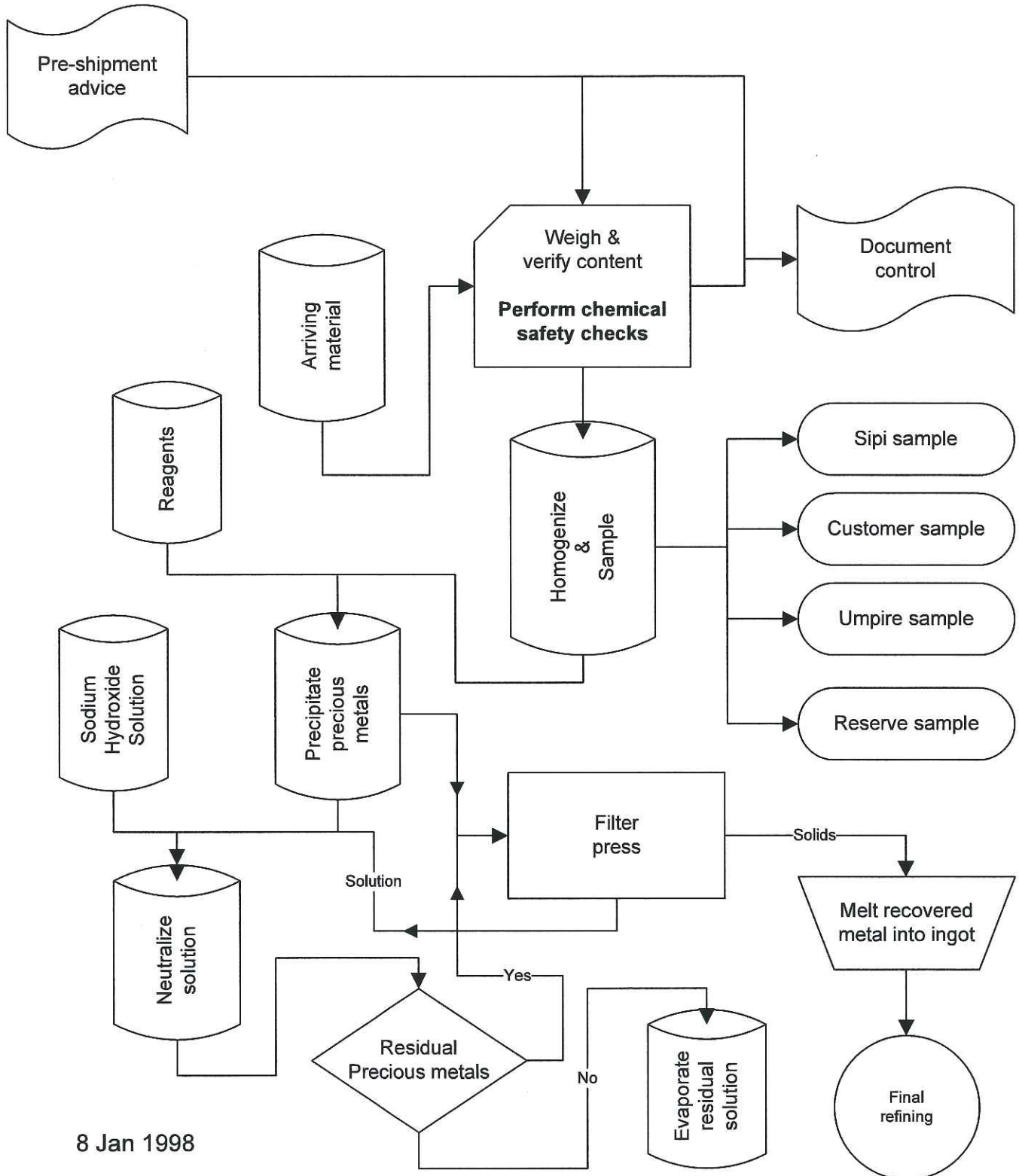


1 Jan 2010

30150-21
Strong Tanks



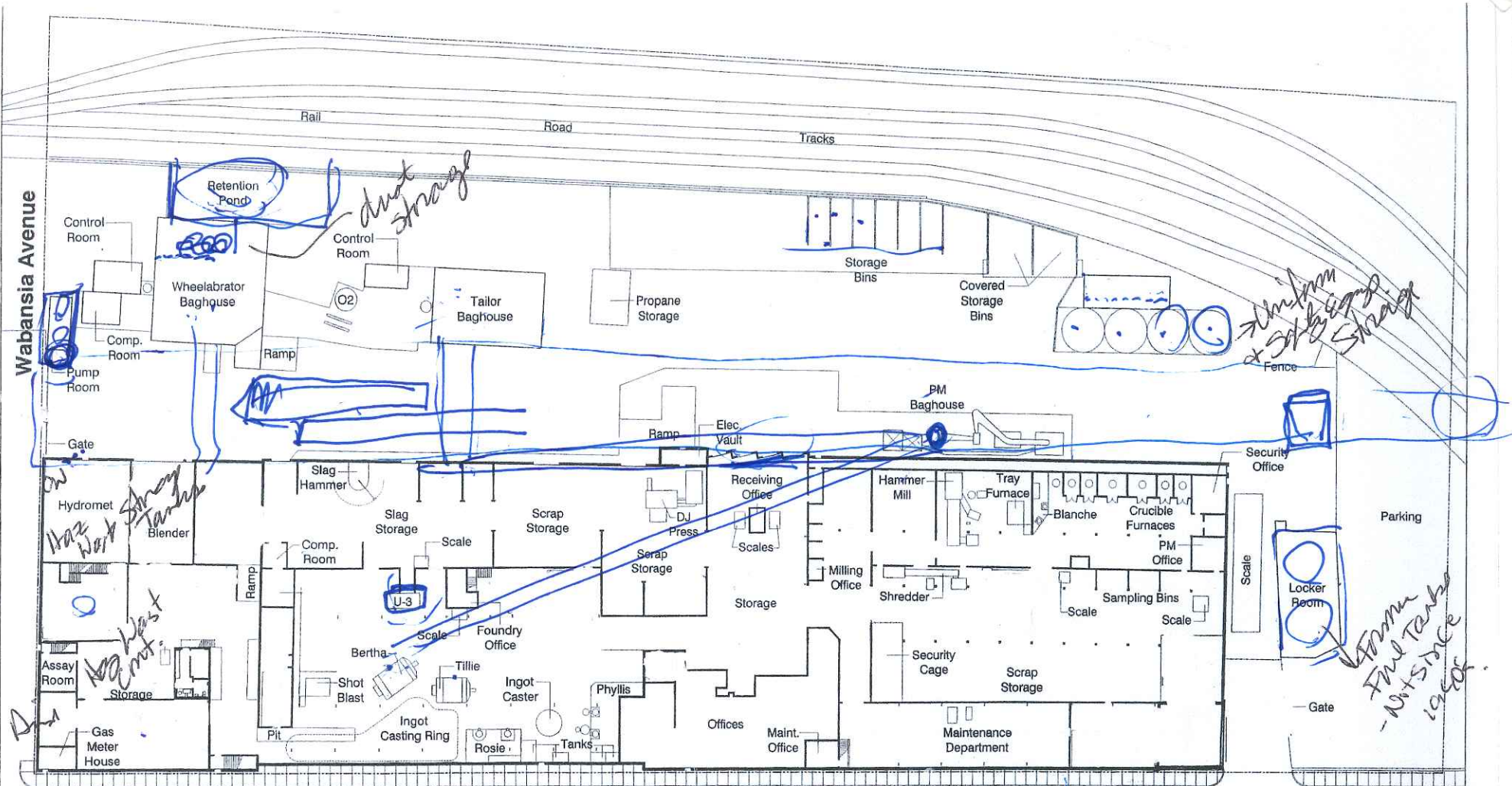
Acidic Solution Processing - Flow Chart



8 Jan 1998

SS eol Antoini

Attachment 3



Building Plan / Site Plan

Elston Avenue



A1

SIPI METALS CORPORATION

1720 North Elston Avenue

Chicago, Illinois

[illegible]

SIPI Metals

7/9/13

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes _____ No <u>2</u> N/A _____	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <u>✓</u> No _____ N/A _____	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes _____ No _____ N/A _____	
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <u>✓</u> No _____ N/A _____	808.121(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes _____ No <u>2</u> N/A _____	722.112(a)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <u>✓</u> No _____ N/A _____	722.112(c)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <u>✓</u> No _____ N/A _____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes _____ No <u>2</u> N/A _____	722.120(b)
	Section 722.121 Acquisition of Manifests Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <u>✓</u> No <u>2</u> N/A _____	
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <u>✓</u> No _____ N/A _____	722.121(a)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes _____ No <u>2</u> N/A _____	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <u>✓</u> No _____ N/A _____	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator:	
	- signed the certificate by hand? Yes <u>✓</u> No _____ N/A _____	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <u>✓</u> No _____ N/A _____	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <u>✓</u> No _____ N/A _____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <u>✓</u> No _____ N/A _____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <u>✓</u> No _____ N/A _____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <u>✓</u> No _____ N/A _____	
		722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Possibly
No container on-site at time of inspection

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p>	
	<p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	2000

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A <u>✓</u>	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <u>✓</u> 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <u>✓</u> 3) existing corrosion protection measures? Yes _____ No _____ N/A <u>✓</u> 4) documented age of the tank system? Yes _____ No _____ N/A <u>✓</u> 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <u>✓</u> *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <u>✓</u> Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes <u>✓</u> No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes <u>✓</u> No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes <u>✓</u> No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes <u>✓</u> No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes <u>✓</u> No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes <u>✓</u> No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes <u>✓</u> No _____ N/A _____	

2000

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	<i>must inspect</i>
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	<p><i>Above ground piping</i></p>
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes <u>2</u> No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>2) overfill prevention controls? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks? Yes <u>2</u> No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>3) data from monitoring equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No <u>2</u> N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record the results of tank inspections as required in Section 725.295(a) and (b)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <u>✓</u></p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <u>✓</u></p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <u>✓</u></p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <u>✓</u></p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <u>✓</u></p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>COMMENTS: 2</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes _____ No <u>2</u> N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <u>✓</u> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <u>✓</u> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <u>✓</u> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <u>✓</u> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <u>✓</u> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <u>✓</u> No _____ N/A _____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <u>✓</u> No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes <u>✓</u> No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes <u>✓</u> No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <u>✓</u> No _____ N/A _____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <u>✓</u> No _____ N/A _____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <u>✓</u> No _____ N/A _____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <u>✓</u> No _____ N/A _____ If "Yes", has the contingency plan been carried out immediately? Yes <u>✓</u> No _____ N/A _____	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <u>✓</u> No _____ N/A _____ - explosions? Yes <u>✓</u> No _____ N/A _____ - releases? Yes <u>✓</u> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

No spills or release minor fire

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A _____ ✓ Is the plan on-site? Yes _____ No _____ N/A _____ ✓ Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A _____ ✓ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A _____ ✓ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ ✓ No _____ N/A _____	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A _____	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes _____ ✓ No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes _____ ✓ No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ ✓ No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No <u>2</u> N/A _____ ✓	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ ✓ No _____ N/A _____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.143
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.150
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> COMMENTS:	722.160
		722.170

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